



# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-2829

PAT QUINN, GOVERNOR

LISA BONNETT, DIRECTOR

May 16, 2014

Mr. Mark Wathen  
The Libman Company  
220 North Sheldon  
Arcola, IL 61910

Re: The Libman Company-Douglas County  
Industrial User Inspection and Industrial Stormwater Inspection  
Permit Numbers 2010-EP-0625 and ILR006297

Dear Mr. Wathen:

On April 10, 2014 Holly Hirschert representing this office visited your facility to perform an inspection of the pretreatment system and an industrial stormwater inspection. At the time of inspection the facility appeared to be in substantial compliance with your NPDES Permits.

Please submit a request that your operating permit be modified to reflect your current operation including the elimination of the phosphate process. You should also request a reduction in the monitoring requirements. These requests should be sent to the Permit Section at the following address:

Illinois Environmental Protection Agency  
Bureau of Water  
DWPC Permit Section #15  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, Illinois 62794-9276

Copies of both inspection reports are enclosed for your information.

Should any questions arise pertaining to this letter, please contact Ms. Hirschert at (217) 278-5800.

Sincerely,

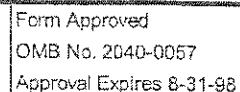
ENVIRONMENTAL PROTECTION AGENCY

Jay Patel, Acting Region Manager  
Field Operation Section-Champaign  
Division of Water Pollution Control

JP: HNH

bcc: BOW/DWPC/FOS & RU, #15  
BOW-DWPC/FOS-Champaign









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LISA BONNETT, DIRECTOR

**Date:** April 30, 2014  
**To:** BOW/DWPC/FOS and RU  
**From:** Holly Hirschert BOW/DWPC/FOS-Champaign *HHH*  
**Subject:** The Libman Company-Douglas County  
Categorical Industrial User Pretreatment Inspection  
Operating Permit Number 2010-EP-0625

## General Information

**Industry Name:** The Libman Company

**Site Address:** 220 North Sheldon  
Arcola, IL 61910

**Contact:** Mark Wathen  
Safety Manager

**Telephone Number:** 217-268-2155

## Manufacturing Process

The Libman Company produces household cleaning tools including brooms, mops, sponges, rags, and refill related products. The principal raw materials are steel, propylene, PVC, and paints.

## Pretreatment Permit

The Libman Company pretreatment operating permit, 2010-EP-0625, was issued September 20, 2010 and will expire August 31, 2015. When the permit was issued the facility employed an iron phosphate process to prepare metal handles for powder coating. Rinse water from the process was sent to a pretreatment system. The discharge of pretreated wastewater from the iron phosphate process caused the facility to be regulated under 40 CFR Part 433 as a metal finishing point source. The Libman Company is permitted to operate the following pretreatment equipment:

- oil skimmers
- collection pit
- equalization tank
- adjustment tank
- two sets of filter bags

In January 2014, a letter was submitted with the semiannual analyses report for the period July 1 through December 31, 2013. The letter indicated that The Libman Company had ceased operating the iron phosphate process and replaced it with a "new green technology". It was signed by an environmental specialist at U.S. Compliance Corporation. I contacted Kevin Goad at Libman to set up a meeting. He said I should contact Mark Wathen in mid-March to set up an inspection. I contacted U.S. Compliance to ask about analyses of water samples that were collected after the iron phosphate process was eliminated. Myles Peterson said he would advise the facility to collect water samples and provide the analyses before my visit. The analytical results for those samples were emailed to me on March 31.



I prepared a summary (attached) of the last six semi-annual analytical reports along with results from the samples collected after the iron phosphate rinse process was eliminated. Nickel, zinc, copper, chromium, and silver were detected at levels above 0.010 mg/l in the last set of samples that were collected on February 25.

#### **Inspection**

On April 10 I met with the following people:

Mark Wathen, Safety Manager  
Kevin Goad, Handle Operations Manager  
Eric Olson, Environmental Specialist, U.S. Compliance Corporation

They explained that metal handles still run through a rinse process before being dried and powder coated. The new process uses a solution provided by Chemetall that does not contain phosphates.

I inquired about the disposal of unused chemicals. Mr. Wathen said most of them were returned to the vendor. Before introducing the new chemicals, the contents of the rinse tanks were discharged to the City of Arcola sanitary sewer system in the same manner that spent solutions have been discharged in the past. He provided a confidential document from Chemetall.

We discussed the most recent semi-annual analytical reports. Metals that were detected in the wastewater are not believed to be the result of the manufacturing practice. We walked through the facility where they showed me the handle processing line. There are no other categorical processes that discharge water to the City of Arcola.

After the inspection, Mr. Wathen sent four additional documents via email. They included material safety data sheets and technical information sheets for Gardobond® AP 9840 and Tech Cool® 35200 TM.

#### **Laboratory**

Satisfactory. All analyses are conducted by Pace Analytical Services, Inc.

#### **Pretreatment Permit Compliance**

Satisfactory. The Libman Company has been in compliance with the effluent limits in operating permit number 2010-EP-0625 since the permit was issued. Semi-annual reports are submitted as required.

#### **Categorical Status:**

I recommend that this facility be reclassified as non-categorical. The requirement to collect semi-annual samples and submit the results to the Agency could be removed from the operating permit. This status will be evaluated by the Permit Section.

cc: Brian Cox BOW/DWPC/Permit Section #15

Attachments: Form 3560  
Pretreatment Summary  
Chemetall Publications





<b>The Libman Company</b> <b>Arcola, Illinois</b> <b>Semi-Annual Metals Monitoring Summary</b> <b>Pretreatment Operating Permit No. 2010-EP-0625</b>										
	Daily Max.	Mon. Avg.	06/22/11	12/14/11	06/13/12	12/03/12	05/11/13	12/09/13	02/25/14	Number of Violations
	Limits (mg/l)									
Nickel	3.98	2.38	0.0538	0.0226	0.0556	0.0587	0.0975	0.0998	0.0787	0
Zinc	2.61	1.48	1.3800	0.0317	0.301	0.165	0.725	0.724	0.866	0
Cyanide (total)	1.20	0.65	0.0115	0.0607	0.0357	0.0961	0.1180	ND	ND	0
Copper	3.38	2.07	0.4270	0.0327	0.0149	0.0997	0.4880	0.2940	0.4530	0
Chromium (total)	2.77	1.71	0.0254	0.0168	0.0894	0.0297	0.0459	0.0412	0.0388	0
Lead	0.69	0.43	0.0106	0.0227	0.0235	0.0139	ND	ND	ND	0
Cadmium	0.11	0.07	0.0023	0.0092	ND	ND	ND	ND	ND	0
Silver	0.43	0.24	ND	ND	ND	ND	ND	ND	0.0194	0
TTO	2.13	-	0.374	0.0715	0.064	0.000	0.000	0.902	0.285	0

<b>The Libman Company</b> <b>Arcola, Illinois</b> <b>Quarterly Monitoring Summary</b> <b>Semi-Annual TTO Monitoring Summary</b>							
	06/22/11	12/14/11	06/13/12	12/03/12	05/11/13	12/09/13	02/25/14
2,4-Dimethylphenol			0.064				
Methylene Chloride*	0.374						
3&4 Methylphenol		0.072				0.902	
Trichloroethene**							0.285
TTO	0.374	0.072	0.064	0.000	0.000	0.902	0.285

\*Attributed to laboratory contamination.

\*\*Not in use at the facility.









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PAT QUINN, GOVERNOR

LISA BONNETT, DIRECTOR

## Memorandum

**Date:** May 5, 2014  
**To:** BOW/DWPC/FOS and RU  
**From:** Holly Hirschert BOW/DWPC/FOS-Champaign *HHH*  
**Subject:** The Libman Company-Douglas County  
Industrial Stormwater Inspection-Permit Number ILR006297

**Facility Address:** 220 North Sheldon  
Arcola, IL 61910

**Interviewed:** Mark Wathen, Safety Manager  
Kevin Goad, Handle Operations Manager  
Eric Olson, Environmental Specialist, U.S. Compliance Corporation

### **Date of Coverage under the ILR00 Permit:**

The Libman Company submitted a notice of intent and was covered by the ILR00 permit in May 2003.

### **Stormwater Pollution Prevention Plan (SWPPP) Evaluation:**

An electronic copy of the Storm Water Pollution Prevention Plan (SWPPP) dated May 2012 was submitted to the Illinois EPA on November 4, 2013. I reviewed the SWPPP prior to the inspection and found it to be in compliance with the ILR00 permit (see attached checklist). The most recent annual facility inspection report was received by the Compliance Assurance Section on November 18, 2013.

### **Site Inspection:**

On April 10, 2014 I conducted an inspection of the subject facility based on the requirements of the General NPDES Permit for Storm Water Discharges from Industrial Activities (ILR00).

During the inspection I explained to Mr. Wathen the importance of including the dates of quarterly inspections and any deficiencies noted along with the report form. I provided a copy of the latest revision of the form and we discussed the advantages of submitting the report electronically.

Following our discussion, we walked through the inside of the facility where I was shown a metal scrap container that had been placed inside the building to eliminate any contact with stormwater.

Outside the building, there were metal frames stored on a paved surface. I noted some dust that had been blown by the wind or washed onto the Libman property from a rock pile on property at the corner of North Sheldon Street and East Front Street. Mr. Wathen said that property is owned by the City of Arcola. It was evident that good housekeeping is a standard practice at the Libman Facility because all other areas were free of debris and sediment.

### **Apparent Violations:**

None.

